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Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

ELISHA SHEPHERD,

Case No. 3:01-cv-333-JKS

Plaintiff.

PROPOSED ADDITIONAL QUESTIONS FOR JURY VOIR DIRE

VS.

MILTON J. JAKEWAY and the UNITED STATES OF AMERICA,

Defendants.

Defendants propose the following questions be added to the Court's questionnaire to the jury:

- 1. Do you know Dr. David Sandberg, who is expected to testify in this case?
- 2. Do you know Dr. David Sperbeck, who is expected to testify in this case?
- 3. Have you ever seen or been under the care of a psychologist? Was that a positive or negative experience? Do you have an opinion concerning psychologists that would affect your ability to serve as a juror?
- 4. Have you ever had police search your home? What were the circumstances?
- 5. Do you trust the police? Why or why not?
- 6. Have you ever made a sexually explicit home video or movie? Do you have opinions concerning people who have made such movies?

Respectfully requested this 10th day of January, 2006, in Anchorage, Alaska.

TIMOTHY M. BURGESS United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2006, a copy of the foregoing Proposed Additional Questions for Jury Voir Dire was served electronically on Yale H. Metzger.

via US mail on

LeRoy E. DeVeaux DeVeaux & Associates 701 W. 41st Avenue, Suite 201 Anchorage, AK 99503-6604

s/ Richard L. Pomeroy